REMARKS

Applicants have now had an opportunity to carefully consider the Examiner's comments set forth in the Office Action of August 03, 2005. Reconsideration of the Application is requested.

The Office Action

The Examiner rejected claims 1-2 and 8-11 under 35 U.S.C. 103(a) as being unpatentable over Tonkin (U.S. Publication 2005/0015392 A1) in view of Allen (U.S. Patent 6,549,299 B1). Claims 3-7 were rejected under 35 U.S.C. 103(a) as being unpatentable over Tonkin in view of Allen as applied to claim 1, and further in view of Yankovich (U.S. Patent 6,704,906).

The Present Embodiment

The present embodiments relate to a data organization method for a controller for a document production system. Specifically, it relates to a method for associating electronic data files to particular document components of a whole document. The method involves the steps of creating a parent node which represents at least a portion of the document. Then, a document form, as defined in Applicant's specification on pages 16-17 is applied to the document. The next step is the creation of document component nodes as sub-nodes of the document node first described. Finally, an electronic data file will be associated with the document component nodes. The steps can be carried out as often as necessary and need not necessarily be carried out in the same order.

Claims 1-2 and 8-11 are Not Obvious

Claim 1 calls for associating an electronic data file with the document component node. The Applicant believes Tonkin fails to teach association of a data file with a component node. The Examiner references paragraphs [0054-0056] of Tonkin as teaching this claim limitation. The applicant respectfully submits that this section of Tonkin describes associating a file with the document as a whole, rather than associating a file with a component node. The user in Tonkin performs this step as soon as the document is created (paragraph [0054] lines 5-7); this occurs before the several components of Tonkin are created. If the document has not yet been parsed into sub-nodes, it would be impossible for Tonkin to associate a file with a sub-node.

Tonkin is laid out in a generally chronological manner, stepping through the actions tat a user would take from the creation of a document to the completion of document assembly. If Tonkin contains discussion of document nodes, it stands to reason that Tonkin would discuss the creation of a parent node before the creation of sub-nodes of the parent node. The Examiner references paragraph [0071] as teaching a parent document node; this is after the section referenced as teaching the sub-nodes. Further, the Examiner references Figure 5B, element 312. Tonkin paragraph [0054] refers to Figure 5B as "the main document editing window", therefore, element 312 allows for the association of a data file with a parent node, not a sub-node. Based on careful review of the Tonkin reference, the Applicant believes there to be an alternative interpretation of Tonkin, one in which Tonkin fails to teach associating data files with document component nodes.

Since Tonkin does not disclose the association of data files with sub-nodes, it fails to disclose all of the elements of **claim 1**. **Claim 1** and **claims 2-11** dependent therefrom distinguish patentably and unobviously over the references of record.

CONCLUSION

For the reasons detailed above, it is submitted all claims remaining in the application (Claims 1-11) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.
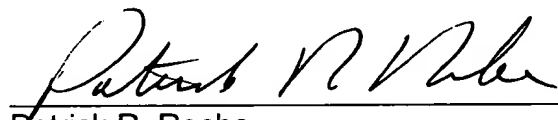
In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to call Patrick R. Roche, at Telephone Number (216) 861-5582.

Respectfully submitted,

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